

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to ERS.

**NOTICE OF FILING AND CORRESPONDING CERTIFICATION REGARDING
THIRTY-THIRD OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE
EMPLOYEES RETIREMENT SYSTEM FOR THE GOVERNMENT OF THE
COMMONWEALTH OF PUERTO RICO TO DEFICIENT CLAIMS**

The Employees Retirement System for the Government of the Commonwealth of Puerto Rico (“ERS”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the representative of ERS pursuant to Section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),² files this certification regarding the *Thirty-Third Omnibus Objection (Non-Substantive) of the Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims* (ECF No.

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA” and together with the Commonwealth, COFINA, HTA, and ERS, the “Debtors”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² PROMESA is codified at 48 U.S.C. §§ 2101-2241.

6282) (the “Thirty-Third Omnibus Objection”)³ to the deficient proofs of claim listed on **Exhibit A** thereto.

ERS, through its advisors, has conducted a comprehensive re-review of each claim subject to the Thirty-Third Omnibus Objection. Each of the claims to be disallowed by the Thirty-Third Omnibus Objection was reviewed by two different sets of reviewers to confirm that the claims assert liabilities in excess of \$1 billion, and failed to comply with the applicable rules by not providing a basis for asserting a claim against ERS or another of the Debtors. Based upon such review, ERS certifies that each of the claims to be disallowed, as identified in the revised proposed order granting the Thirty-Third Omnibus Objection attached hereto as **Attachment 1**, and the accompanying schedule of claims attached thereto as **Exhibit A**, in fact, asserts liability in excess of \$1 billion and does not provide any basis for the asserted claim against ERS or another of the Debtors.

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³ Capitalized terms not defined herein shall have the meanings set forth in the Thirty-Third Omnibus Objection.

Dated: July 18, 2019
San Juan, Puerto Rico

Respectfully submitted,

/s/ Hermann D. Bauer

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